

# OSBORN LAW P.C.

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June 30, 2025

## VIA ECF

Honorable Ona T. Wang  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Lopez, Jr. v. Commissioner of Social Security*,  
Civil Action 1:25-cv-01978-JHR-OTW

Dear Judge Wang,

We write on behalf of plaintiff, Angel Lopez, Jr., and with the consent of the defendant, to request a 90-day extension of time to file plaintiff's motion for judgment on the pleadings per the Court's Standing Scheduling Order. Plaintiff's motion is due on July 9, 2025. This is the parties' first request for an extension. The reason for this request is that Plaintiff's counsel currently have overlapping Social Security brief deadlines in the upcoming weeks.

Subject to the approval of the Court, the amended briefing schedule would be as follows:

1. Plaintiff to file his motion for judgment on the pleadings on or before **October 7, 2025**;
2. Defendant to file its response/cross-motion on or before **January 5, 2026**;  
and

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3. Plaintiff to file his reply (if any) on or before **January 19, 2025**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn

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cc: Candace Brown Casey, Esq. (by ECF)

Application **GRANTED**.

**SO ORDERED.**



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Ona T. Wang  
U.S.M.J. 7/1/2025